

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**DECLARATION OF JAMES I. MCCLAMMY IN SUPPORT OF DEBTORS  
OBJECTION TO BLUE OWL CAPITAL LLC’S EMERGENCY MOTION TO EXTEND  
CHALLENGE PERIOD AND REMOVE BLANKET “PROFESSIONAL  
EYES ONLY” DESIGNATION FROM PRODUCTIONS OR,  
IN THE ALTERNATIVE, APPOINT AN EXAMINER**

James I. McClammy, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am a partner in the law firm of Davis Polk & Wardwell LLP and an attorney admitted *pro hac vice* to represent Debtors in the above-captioned action. I submit this reply declaration in support of Debtors Objection to Blue Owl Capital LLC’s Emergency Motion to Extend Challenge Period and Remove Blanket “Professional Eyes Only” Designation from Productions or, in the Alternative, Appoint an Examiner.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an email from Darren Azman to Adam Shpeen and Justin Alberto, dated October 16, 2024.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a letter from Monica Asher to Brian Resnick and Adam Shpeen, dated October 17, 2024, appending the Notice of First

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Request for the Production of Documents of the Official Committee of Unsecured Creditors  
Directed to the Debtors.

4. Attached hereto as **Exhibit 3** is a true and correct copy of an email from Matthew Brock to Monica Asher et al., dated October 18, 2024.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an email from Matthew Brock to Stacy Lutkus et al., dated October 24, 2024.

6. Attached hereto as **Exhibit 5** is a true and correct copy of an email from Stacy Lutkus to Matthew Brock et al., dated October 25, 2024.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a letter from Matthew Brock to Committee counsel, dated October 25, 2024.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a letter from Matthew Brock to Committee counsel, dated October 28, 2024.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a letter from Matthew Brock to Committee counsel, dated October 28, 2024.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a letter from Matthew Brock to Committee counsel, dated October 30, 2024.

11. Attached hereto as **Exhibit 10** is a true and correct copy of a letter from Matthew Brock to Committee counsel, dated November 3, 2024.

12. Attached hereto as **Exhibit 11** is a true and correct copy of an email from Stacy Lutkus to Brian Resnick et al., dated October 28, 2024.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an email from Benjamin Finestone to James McClammy et al., dated October 30, 2024.

14. Attached hereto as **Exhibit 13** is a true and correct copy of a letter from Matthew Brock to Benjamin Finestone, dated October 30, 2024.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a letter from Matthew Brock to Benjamin Finestone, dated October 30, 2024.

16. Attached hereto as **Exhibit 15** is a true and correct copy of a letter from Matthew Brock to Benjamin Finestone, dated November 3, 2024.

17. Attached hereto as **Exhibit 16** is a true and correct copy of an email from Stacy Lutkus to Justin Alberto et al., dated November 4, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Wilmington, Delaware  
November 5, 2024

/s/ James I. McClammy  
James I. McClammy